

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

**ORIENTAL BANK**  
PLAINTIFF.

**CIVIL CASE NO.: 24-01550 (MAJ)**

V.

**PENTZKE LEMUS, ET AL.**  
DEFENDANTS.

**MOTION FOR JOINDER OF MOTION TO DISMISS**

**TO THE HONORABLE COURT:**

**COMES NOW**, codefendant Stefania Vélez Echevarría (hereinafter, “Ms. Vélez” or “Defendant”) by and through the undersigned attorney, and very respectfully states and prays as follows:

1. In accordance with Rule 10(c) of the Federal Rules of Civil Procedure, a party is allowed to adopt by reference statements and pleadings of any other pleading or motion within a case. Fed. R. Civ. P. 10(c).
2. Codefendant Raymond Bosque-Del Toro filed a *Motion to Dismiss* on March 18<sup>th</sup>, 2025. *See Docket number 163.*
3. In said pleading, Codefendant Raymond Bosque-Del Toro requested the Honorable Court to dismiss the Complaint for the following reasons: (1) failure to meet Rule 9(b)’s pleading standards for fraud; (2) failure to plead predicate acts of racketeering; (3) lack of standing; (4) failure to establish a pattern of racketeering; and (5) failure to plead that the predicate acts are sufficiently related to establish a “pattern.”; among others. *See Docket number 163.*
4. The appearing Codefendant has reviewed Codefendant Raymond Bosque-Del

Toro's motion to dismiss and wishes to join in and adopt in its *entirety* the contents of said motion, as they relate identically to Stefania Vélez Echevarría.

5. The appearing party hereby adopts by reference and joins Raymond Bosque-Del Toro statements and pleadings on his *Motion to Dismiss*, insofar as the allegations relate to the appearing codefendant, Stefania Vélez Echevarría, requesting dismissal of the present claim against codefendant Stefania Vélez Echevarría. *See Docket Number 163.*

**WHEREFORE**, we respectfully request from this Honorable Court that this motion for joinder be granted and that the Complaint against Stefania Vélez Echevarría be dismissed accordingly.

**WE HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification electronically to all counsel of record.

**RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico, this 18<sup>th</sup> day of March 2025.

s/ Gilberto J. Oliveras Maldonado  
**Gilberto J. Oliveras Maldonado**  
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